

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

**v.**

**CRIMINAL NO. RDB-23-0296**

**ERIC CHASE  
(A/K/A DAVID BLACKWELL),**

**Defendant.**

**CONSENT MOTION TO DISMISS COUNT TWO**

The United States of America, by and through undersigned counsel, respectfully moves this Court, pursuant to Federal Rule of Criminal Procedure 48(a), for leave to dismiss Count Two of the Superseding Indictment (ECF 37).

While the government maintains Count Two was appropriately charged, proving the count at trial would introduce unnecessary complexity and raise potential appellate issues. In the interest of judicial efficiency, the Government seeks to dismiss Count Two and proceed to trial on Counts One and Three. The defendant consents to the dismissal of Count Two. No party will be prejudiced by this request.

WHEREFORE, the government respectfully requests that the Court grant this unopposed motion and dismiss Count Two of the indictment with leave of court.

Kelly O. Hayes,  
United States Attorney

By:                     /s/                      
Patricia McLane  
Assistant U.S. Attorney  
Jacob Gordin  
Special Assistant U.S. Attorney

Leave of Court is granted for the filing of the foregoing dismissal of Count Two.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Honorable Richard D. Bennett  
United States District Court Judge